

FILED

MAR 22 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY CLERKUNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISIONUNITED STATES OF AMERICA,
Plaintiff,

v.

LORENA MORENO,
Defendant.

EP.13.M-780-LFC

**UNITED STATES' MOTION TO DETAIN DEFENDANT WITHOUT
BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f)(1)(C), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant attempted to import into the United States from Mexico approximately 79.3 grams of fentanyl.
2. The Defendant was subsequently charged in a criminal complaint with a violation of the Controlled Substances Act which carries a term of imprisonment of 10 years or more.
3. Subject to rebuttal by the Defendant, it shall be presumed that no condition or combination of conditions will reasonably assure the appearance of the Defendant as required and the safety of the community if the Court finds there is probable cause to believe the Defendant committed the offense. 18 U.S.C. § 3142(e)(2)(A).

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By: Victoria S. Crosby
VICTORIA S. CROSBY
Assistant U.S. Attorney
Wisconsin Bar #1104704
700 E. San Antonio, Suite 200
El Paso, Texas 79901
(915) 534-6884